

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

----- X
LAKESHORE TECHNICAL COLLEGE,

Plaintiff,

v.

ANTHOLOGY INC.,

Defendant.
----- X

:
: Case No.:
:

: **DECLARATION OF**
: **RAMONA DESANTIS IN**
: **SUPPORT OF REMOVAL**
: **PETITION**
:
:
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1. My name is Ramona DeSantis. I have personal knowledge of the facts stated herein. If called to testify, I could and would testify competently and consistently with this declaration.

2. I am currently employed by Anthology Inc. ("Anthology") as its Vice President, Treasury & Financial Systems. By reason of my employment, I know that Anthology is a Florida corporation.

3. In my role as Vice President, Treasury & Financial Systems, I am familiar with Anthology's financial and accounting records and systems and have personal knowledge of and experience with searching Anthology's financial and accounting records and systems.

4. By reason of my role within Anthology and in connection with the filing of a Notice of Removal in this lawsuit, I accessed Anthology's financial and accounting systems to determine the amounts Anthology has received from its customer Lakeshore Technical College ("Lakeshore").

5. Specifically, on September 19, 2024, I accessed a "Summary of Account" for Lakeshore from Anthology's financial and accounting systems. The "Summary of Account" I

accessed is a record Anthology creates, maintains, and relies upon in the ordinary course of its business.

6. According to Anthology's financial and accounting records, Lakeshore has paid to Anthology \$2,266,092.28 and owes \$919,221.39 in invoiced amounts due. Before submitting this declaration, I verified within Anthology's financial and accounting systems that these numbers remain correct and accurate.

7. I make this declaration under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This is the 4th day of October, 2024.



Ramona DeSantis